

September 24, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 99-87/RM-9332

Dear Ms. Dortch:

Please accept this letter in support of the petition for reconsideration filed by the Association of Public-Safety Communications Officials (APCO), the International Municipal Signal Association (IMSA), the International Association of Fire Chiefs (IAFC), and other public safety organizations in the above-referenced proceeding regarding mandatory migration to narrowband operations on public safety land mobile radio systems in the VHF High Band (150-170 MHz) and UHF (421-512 MHz) frequencies.

The majority of fire service radio systems in our area, as well as throughout Illinois including DU-COMM, utilize VHF High Band frequencies for both dispatch and operations. While we support migration to narrowband technologies, the stark reality is that it will take many years to phase out the tens of thousands of wideband radios that are in daily use by large city as well as small rural volunteer departments in Illinois.

As the result of new Homeland Security initiatives, the Mutual Aid Box Alarm System (MABAS), that represents over 800 fire departments in Illinois, Southern Wisconsin and the St. Louis, Missouri area, has adopted a communications interoperability plan that includes four (4) existing wideband frequencies and four (4) new narrowband channels. All fire departments in Illinois, as well as member departments in adjacent states, have been encouraged to obtain FCC authorizations for the eight frequencies.

MABAS is one of the fastest growing mutual aid organizations in the United States. The FCC's rulemaking concerning "near-term" dates for limiting expansion on existing wideband frequencies will derail our interoperability plan and potentially place the safety of both first responders and the general public in jeopardy. The current deadline of January 13, 2004 for the FCC to accept applications to modify existing 25 kHz systems will prevent public safety licensees from adding critical capacity and coverage for existing systems and expansion for interoperability. Modifications to existing as well as approval of new authorizations that enhance public safety interoperability should be permitted until the final migration deadline.

The Commission's actions prohibiting the certification, manufacture and importation of 25 kHz capable land mobile radio equipment after 2008 will also have a devastating effect on most area fire departments. Hundreds of fire departments lack the necessary financial resources to purchase basic personal protective equipment, modern fire apparatus and support required training programs. The FCC's actions will ultimately require these departments to spend thousands of precious dollars to replace radio equipment to permit narrowband operation well before the 2018 deadline. The deadline for manufacture and sale of 25 kHz capable radios should coincide with the deadline for mandatory conversion to narrowband emissions. In the case of DU-COMM, we are 27 agency centralized 9-1-1 dispatch facility serving 700,000 residents of DuPage County. Our infrastructure contains 43 transmitters, 93 receiver sites, and 2000 mobile/ portable radio equipment. To meet the mandate would require replacement of infrastructure and portable radio equipment at a cost of \$20 million. With a tough economy and tax revenues down the municipalities will not be able to fund a project of this magnitude.

Thank you for your attention, and the attention of the full Commission, regarding the important public safety issues addressed. We support the Petition for Reconsideration filed in response to the Commission's ruling in WT Docket Number 99-87 and strongly encourage the Commission to reverse its ruling and involve public safety professionals in further rule making that adversely affects the public safety and health of the citizens of the United States of America.

Sincerely,

George Longmeyer
Executive Director

cc: Senator Durbin
Senator Fitzgerald
Congressman Henry Hyde
Congresswoman Judy Biggert